

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**  
**SECURITIES INVESTOR PROTECTION  
CORPORATION,**

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

FULLERTON CAPITAL PTE LTD.,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01004 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND  
AND ADJOURNING THE PRE-TRIAL CONFERENCE**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff, individually, by and through his counsel, Baker & Hostetler LLP, and defendant Fullerton Capital PTE Ltd. (“Fullerton”), by and through its counsel, Arnold & Porter LLP, hereby stipulate and agree as follows:

WHEREAS on January 5, 2012, the Trustee filed a complaint in the above-captioned adversary proceeding against Fullerton in this Bankruptcy Court (the “Court”), asserting bankruptcy law claims (the “Complaint”);

WHEREAS on April 2, 2012, Fullerton filed a motion to dismiss the Complaint in this action;

WHEREAS the parties to this stipulation reserve all rights and defenses the Trustee and Fullerton may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction;

IT IS HEREBY STIPULATED AND AGREED by and between the Trustee and Fullerton, by the endorsement of their counsel below, that:

1. The Trustee shall respond to Fullerton’s motion to dismiss the Complaint no later than September 1, 2015;
2. Fullerton’s reply to the Trustee’s response shall be filed and served no later than October 15, 2015; and
3. The Pre-Trial Conference shall be adjourned from August 26, 2015, to December 16, 2015, at 10:00 a.m.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 10106).

Dated: June 5, 2015  
New York, New York

By: /s/ David J. Sheehan  
BAKER & HOSTETLER LLP  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Thomas L. Long  
Email: tlong@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Estate of Bernard L. Madoff*

By: /s/ Mark R. Sylvester  
ARNOLD & PORTER LLP  
399 Park Avenue  
New York, New York 10022  
Telephone: (212) 715-1000  
Facsimile: (212) 715-1399  
Kent A. Yalowitz  
Email: Kent.Yalowitz@aporter.com  
Mark R. Sylvester  
Email: Mark.Sylvester@aporter.com

*Attorneys for Defendant Fullerton Capital PTE Ltd.*